

UNITED STATES DISTRICT COURT  
FOR THE  
COLUMBIA DIVISION, DISTRICT OF SOUTH CAROLINA

Clarence B. Jenkins Jr.	)	
Plaintiff,	)	
	)	
v.	)	
	)	
South Carolina Department of Employment	)	
Workforce, South Carolina Department of	)	
Administration, South Carolina Office of	)	
Inspector General, South Carolina Human	)	
Affairs Commission, South Carolina Department	)	
of Public Safety, Richland County Government,	)	
South Carolina Secretary of State and	)	
Office of South Carolina Governor.	)	
Defendants	)	
_____	)	

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I Clarence B. Jenkins Jr. as Pro Se Plaintiff brings this litigation against all Defendants for Civil Rights Violations of employment discrimination, retaliation and fraudulent records. The violations of Deprivation and Title VII of the 1964 Civil Rights Act are proper in this COURT. I as Pro Se Plaintiff filed this Complaint in U.S District court, Columbia Division because of federal violations which is proper to address Civil Rights Violations.

Defendants as individually and collectively sought to harm by violations of Title VII of the Civil Rights Act of 1964 per employment discrimination and retaliation with “Barred From Applying, Does Not Meet Minimum Qualifications, Candidate Has Been Marked Per NEOGOV and NEPOTISM” applied by S.C Department of Employment Workforce(hereafter SCDEW). All Defendants individually and collectively retaliated against Pro Se Plaintiff for filing Complaints with U.S. Equal Employment Opportunity Commission(hereafter USEEOC) and litigation in the COURTS that included violations of Title VII of the Civil Rights Act of 1964 by S.C. State Government Agencies. All Defendants individually and collectively conspired and cover up Civil Rights Violations by denying written verifiable evidence regarding “Barred From Applying, Does Not Meet Minimum Qualifications, Candidate Has Been Marked Per NEOGOV and NEPOTISM” applied by SCDEW. Pro Se Plaintiff suffered Deprivation as stated under Title VII of the Civil Rights Act of 1964 18 US Code 242 and 18 US Code 1983 because the illegal actions by all Defendants to deny him the basic rights of obtaining employment and to earn an income with sustain life. The illegal actions by all Defendants has caused Pro Se Plaintiff to still be on foodstamps as of June, 2023. The classifications of “Barred From Applying, Does Not Meet Minimum Qualifications, Candidate Has Been Marked Per NEOGOV and NEPOTISM” were character assassination to destroy. Also “Barred From Applying, Does Not Meet Minimum Qualifications, Candidate Has Been Marked Per NEOGOV and NEPOTISM” are fraudulent based on his education and professional work experiences to deny employment opportunities. Plaintiff suffers anxiety

depression, deprivation, mental anguish along with other medical problems,

Pro Se Plaintiff brought a previous Case# 3-18-CV-1874-TLW-PJG for Title VII of the 1964 Civil Rights Act against some Defendants(SCDEW, SCHAC and Office of South Carolina Governor) that was dismissed as UNTIMELY which was unlawful according S.C. Code of Laws 65-2-D(1) that is included. S.C. Code 65-2-D(1) states that if alleged unlawful practice is of continuing nature the date of the occurrence is of the said practice shall be deemed to be any date after commencement of the practice up to and including the date on which practice shall have ceased. Pro Se Plaintiff filed Complaint# 436-2011-00948 filed with USEEOC on August 14, 2011 for secret blackballing affect by SCDEW to deny employment due to numerous of rejection email letters. And so Complaint# 436-2011-00948 was the original lawful action filed against SCDEW for employment discrimination that led into unlawful retaliation efforts that is outline below.

Pro Se Plaintiff filed Complaint# 436-2013-00729 with USEEOC on July 3, 2013 for continuing harassment and hostile treatment by SCDEW which was Amended on August 14, 2013 after being informed by email on July 24, 2013 from Sharlayne Bellamy of S.C. Judicial Center stating she had received notification of "Barred from Applying". Pro Se Plaintiff met the STANDARD of S.C. Code of Law 62-2-D(1) as continuation. Because of improper and failed investigation by USEEOC Greenville Local Office along with SCHAC regarding Complaints# 436-2011-00948 and #436-2013-00729 therefore a Substantial Weight Review was requested.

Rueben Daniels, USEEOC Regional Director completed a Substantial Weight Review for Complaint# 436-2011-00948 and Complaint# 436-2013-00729 unlawfully AFFIRMING both on December 9, 2014 to cover up improper investigations by USEEOC Greenville Local Office along with S.C. Human AFFairs Commission(hereafter SCHAC).

Pro Se Plaintiff received written email verifications from NEOGOV on May 22, 2019 through May 29, 2019 that “Barred From Applying, Does Not Meet Minimum Qualifications and Candidate Has Been Marked Per NEGGOV” are not system errors claimed by SCDEW but features of the product. SCDEW along with other South Carolina State Agencies committed Civil Rights Violations and provided fraudulent statements to cover up employment discrimination and retaliation. Pro Se Plaintiff filed Complaint# 436-2019-01095 based on evidence from NEOGOV which stated “Barred From Applying, Does Not Meet Minimum Qualifications and Candidate Has Been Marked Per NEGGOV” are not system errors claimed by SCDEW but features of the product. And so the evidence from NEOGOV disputed claims of a system error by SCDEW therefore established a cover up to concealed and deny Civil Right Violations. USEEOC unlawfully dismissed Complaint# 436-2019-01095 within five(5) of signing Charge without an investigation therefore improper procedures to deny justice for Civil Rights Violations. Pro Se Plaintiff met the STANDARD for 65-2-D(1) as continuation.

Pro Se Plaintiff received additional evidence from NEOGOV on August 12, 2019 that “Barred From Applying, Does Not Meet Minimum Qualifications and Candidate Has Been Marked Per NEGGOV” are not system errors claimed by SCDEW but features of the product. SCDEW along with other South Carolina State Agencies committed Civil Rights Violations and provided fraudulent statements to cover up employment discrimination and retaliation. Pro Se Plaintiff filed Complaint# 436-2019-01214 based on that additional evidence from NEOGOV which disputed claims by SCDEW. USEEOC unlawfully dismissed Complaint# 436-2019-01214 within four days(4) of signing Charge# 436-2019-01214 without a proper investigation based new evidence from NEOGOV.

An additional Complaint# 436-2021-00092 was filed with USEEOC based on new evidence from S.C. Department of Administration(hereafter SCDOA) on January 29, 2020 regarding fraudulent classification of NEPOTISM applied to my applicant master profile to deny employment opportunities. USEEOC also dismissed Complaint# 436-2021-00092 without a proper investigation to deny justice.

Pro Se Plaintiff brought prior litigation against SCDEW, SCHAC, SCDOA and Office of South Carolina Governor for Civil Rights Violations because he exhausted ADMINISTRATIVE REMEDIES by filing a complaint USEEOC that issued a Right To Sue Notice in Complaint# 436-2019-01095, #436-2019-01214 and # 436-2021-00092. The COURT erred in prior RULING when it stated that Pro Se Plaintiff did not

exhausted ADMINISTRATIVE REMEDIES. There is no other ADMINISTRATIVE REMEDIES other than to file a lawsuit in federal court for Civil Rights Violations upon a Right To Sue Notice by USEEOC. The RULING by U.S. District Court and Supreme Court of the United States were egregious acts of JUDICIAL MISCONDUCT. And no one is above the law not even The President of the United States of America therefore same standard should be applied to judges when there judicial conduct is intentional harm.

The United States Constitution applies to all citizens of these United States and therefore no one above is the law. Intentional Judicial errors of the COURT(S) is verified by RECORD of COURT which is maintain by the Clerk of Court.

I as Pro Se Plaintiff has published one hundred and thirty eight videos(138) on Youtube at @clarencejenkinsjr496 with verifiable evidence of record that has been provided to Defendants, USEEOC and COURTS that all turn a blind eye to injustice with regards to Civil Rights Violations of Title VII of the 1964 Civil Right Act and 18 US Code 242 along with 18 US Code 1983 for Deprivation. The substantial evidence of record establishes a pattern of TwoTier Justice System that applies differently to injustice of African Americans or blacks compared to Systems of White Institutionalism. And I as an African American or black man saw this Two Tier Justice System that was unequally applied to me.

therefore improper conduct. Pro Se Plaintiff met the STANDARD of 65-2-D(1) as continuation.

Pro Se Plaintiff received written email verification from NEO.GOV on August 12, 2019 regarding NEPOTISM was not a system error as claimed by SCDEW and State of South Carolina but a feature of the product. SCDEW committed Civil Rights Violations and provided fraudulent statements to cover up employment discrimination and retaliation. Pro Se Plaintiff filed Complaint# 436-2021-00092 based on documentations from NEO.GOV which disputed claims by SCDEW on January 29, 2020 that was unlawfully dismissed within days of signing Charge without an investigation by USEEOC therefore improper conduct. Pro Se Plaintiff met the STANDARD of 65-2-D(1) ) as continuation. The State of South Carolina, USEEOC, SCHAC and COURTS have negligently violated DUE PROCESS under the 14<sup>th</sup> Amendment of U.S. Constitution with regards to Civil Rights Violations filed Violations Pro Se Plaintiff has been denied DUE PROCESS that is required by the 14<sup>th</sup> Amendment of The United States Constitution with Judicial Misconduct by State and Federal Judicial Systems of South Carolina due to improper adjudication of evidence regarding Civil Rights Violations. Pro Se Plaintiff has made eighty-six (86) you tubes laying out the case with actual records of evidence declaring all Defendants to be LIARS AND RACISTS denying Civil Rights Violations and DUE PROCESS. In judicial filings through Attorney Eugene H. Matthews has been declared that STATE AGENCIES are not considered "Person" which is against S.C. Code of Laws 1-13-30(d). The actual law of S.C. Code of Law 1-13-30(d) was provided to the COURTS turn a blind eye to

injustice as deliberate actions to deny lawful Civil Rights Claims against all Defendants. Pro Se Plaintiff as of May 23, 2022 received correspondence from South Carolina Human Affairs Commission(hereafter SCHAC) who was a prior Defendant in Case# 3:16-CV-03255-TLW-PJG has now declared by writing that STATE AGENCIES are "Person" according to S.C. Code of Laws 1-13-30(d) And so when the COURTS accepted an deliberate an unlawful conclusion of S.C. Code of Law 1-13-30(d) as a "Person" by Defendant(s) to deny Civil Rights Claims that was in violation of DUE PROCESS under the 14<sup>th</sup> Amendment of the U.S. Constitution.

Pro Se Plaintiff has received correspondences in 2022 from South Carolina Insurance Reserve Fund that Case# 3:21-CV-1606-TLW-PJG filed 2021 in U.S. District Court, Columbia, South Carolina against State of South Carolina Government Agencies for Civil Rights Violations for employment discrimination denying a job opportunity of 2013 at S.C. Judicial Center because an illegal bar of "Barred from Applying" would be dismiss without proper Adjudication. And this would be again a violation of DUE PROCESS under the 14<sup>th</sup> Amendment of U.S. Constitution. Also the COURTS has been presented evidence that showed a CONFLICT OF INTERESTS with Gignilliant Savitz Bettis LLP in court's filings that it turn a blind eye to improper adjudication of the Case# 3:21-CV-1606-TLW-PJG.

Defendants actions of employment discrimination and retaliation were based substantial verifiable evidence. Defendants issued a fraudulent notification to employers regarding "Barred From Applying" stating NEO.GOV applied an illegal bar to deny Civil Rights Violations. "Barred From Applying" is a continuing actions by Defendants to



harm. All Defendants has participated in a concerted and deliberate efforts to commit Civil Rights Violations by act, cover up, and conspiracy of Civil Rights Violations. NEO.GOV has provided to Pro Se Plaintiff in writing that "Barred from Applying and NEPOTISM" were applied by the USERS(SCDEW) of their products. All Defendants knew that Civil Rights Violations of Pro Se Plaintiff had been violated. All Defendants were informed of Deprivation by their illegal acts that violated federal and state laws therefore knew of the harm it caused. Pro Se Plaintiff provided all Defendants with actual written verifications of Civil Rights Violations of Title VII of the 1964 Civil Rights Act, Deprivation and DUE PROCESS. Pro Se Plaintiff has substantial wealth of evidence against all Defendants that has been denied unlawfully which are publicly being displayed as a MISCARRIAGE OF JUSTICE. And the COURTS has committed other MISCARRIAGE OF JUSTICE which Records of the COURT provides evidence upon a review.

Pro Se Plaintiff is providing notification to this COURT that additional Defendant(s) may be added upon locating them through personal information or their estates. And therefore a request of the COURT due to any attempts by additional Defendants to transfer, move or hide personal assets after becoming aware of this lawsuit be placed on hold. Pro Se Plaintiff are submitting documents as records of evidence as verifications to Pleadings. Additional evidence will be submitted to verify Civil Rights Violations. See attachments.

The U.S. District Court, Columbia, South Carolina has sent Pro Se Plaintiff several correspondences by email communications requesting that he make the appropriate filings with the COURT as provided with this Complaint. Defendant(s) tried to concealed documents verifying that it believed the COURT would dismissed the Complaint without proper adjudication required by DUE PROCESS as provided with this Complaint. South Carolina Human Affairs Commission(SCHAC) a Defendant in a prior lawsuit has now confirmed as of 2022 that state agenc(ies) are considered "Person" as presented by Pro Se Plaintiff which the COURT ignored the law to denied proper ADJUDICATION.

#### **I. CAUSES OF ACTION**

Defendants committed Civil Rights Violations of the Title VII. Of the 1964 Civil Rights Act

#### **II. CAUSES OF ACTION**

Defendants committed Deprivation of 18 U.S. Code 242

#### **III. CAUSES OF ACTION**

Defendants committed Civil Rights Violations of 42 U.S.C 1983


#### **IV. CAUSES OF ACTION**

Defendants committed violations of DUE PROCESS of the 14 Amendment of U.S. Constitution

Pro Se Plaintiff is providing notification to this COURT that additional Defendant(s) may be added upon locating them through personal information or their estates. And therefore a request of the COURT due to any attempts by additional Defendants to transfer, move or hide personal assets after becoming aware of this lawsuit be placed on hold. Pro Se Plaintiff are submitting documents as records of evidence as verifications to Pleadings. Additional evidence will be submitted to verify Civil Rights Violations. See attachments.

**WHEREFORE**, Pro Se Plaintiff submit this Complaint as violations of Title VII of 1964 Civil Rights Act, Deprivation of 18 U.S. Code 242, 42 U.S.C 1983 and 14<sup>th</sup> Amendment of U.S. Constitution. Pro Se Plaintiff request a jury trial. Pro Se Plaintiff prayerfully request that jury trial be granted as DUE PROCESS under 14<sup>th</sup> Amendment of U.S. Constitution which affords every man equal protection.

*June 28, 2023*

  
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Pro Se Plaintiff